

EXHIBIT D

Cooper & Kirk

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August 30, 2021

VIA ELECTRONIC MAIL

Howard Cooper, Esq.
Todd & Weld, LLP
One Federal Street
Boston, MA 02110

Re: **Request to Remove Confidentiality Designation of Settlement Agreement**

Dear Howard:

I write in response to your letter of August 26, 2021, requesting Ms. Giuffre's agreement to remove the confidentiality designation of the November 2009 Settlement Agreement between her and Jeffrey Epstein.

Our client is but one of the parties to the Settlement Agreement at issue and thus is not in position to unilaterally lift the confidentiality designation from this document. While we agree that the fact that Ms. Giuffre entered into a Settlement Agreement with Jeffrey Epstein is not confidential, we do not agree that "a fair reading" of the Settlement Agreement limits its confidentiality to the amount of the settlement. To the contrary, the Settlement Agreement plainly requires the parties to maintain confidentiality of the entire Settlement Agreement, in whole or in part. We have previously produced this confidential Settlement Agreement to you consistent with Judge Preska's rulings that we provide to the Defendant a copy of the Plaintiff's document production from the *Maxwell* case subject to the *Maxwell* Protective Order under which the Settlement Agreement was initially designated as confidential and produced. Thus, if you wish to have the confidentiality of this Settlement Agreement lifted, you will need to request such relief from Judge Preska.

Sincerely,

/s/ Charles J. Cooper
Charles J. Cooper

cc: David Boies, Esq.
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